

Robert W. Boatman (009619)  
Mark S. O'Connor (011029)  
Paul L. Stoller (016773)  
Shannon L. Clark (019708)  
C. Lincoln Combs (025080)  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
602-530-8000  
602-530-8500 – fax  
[rwb@gknet.com](mailto:rwb@gknet.com)  
[mark.oconnor@gknet.com](mailto:mark.oconnor@gknet.com)  
[paul.stoller@gknet.com](mailto:paul.stoller@gknet.com)  
[slc@gknet.com](mailto:slc@gknet.com)  
[Lincoln.combs@gknet.com](mailto:Lincoln.combs@gknet.com)  
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

Dorothy Kay Alexander and Jonathan  
Hankins, a married couple,

Plaintiff,

v.

C.R. Bard, Inc., an Arizona Corporation,  
and Bard Peripheral Vascular, Inc., an  
Arizona Corporation,

Defendants.

No. MD-15-02641-PHX-DGC

Civil Action No.: 2:16-cv-00690-DGC

**NOTICE OF FILING AMENDED  
COMPLAINT**

Pursuant to Local Rule of Civil Procedure 15.1(b), Plaintiffs Dorothy Kay Alexander and Jonathan Hankins respectfully submit this Notice of Filing Amended Complaint. Attached as Exhibit A is a copy of the amended complaint that indicates in what respect it differs from the original complaint. The Defendants do not oppose Plaintiffs' filing of this Notice or the Amended Complaint.

1 RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of May 2016.

2 **GALLAGHER & KENNEDY, P.A.**

3  
4 By /s/ Robert W. Boatman  
5 Robert W. Boatman  
6 Mark S. O'Connor  
7 Paul L. Stoller  
8 Shannon L. Clark  
9 C. Lincoln Combs  
10 2575 East Camelback Road  
11 Phoenix, Arizona 85016-9225  
12 *Attorneys for Plaintiff*

13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on this 5th day of May, 2016, I electronically transmitted the  
15 attached document to the Clerk's Office using the CM/ECF System for filing and  
16 transmittal of a Notice of Electronic Filing.

17 /s/ Deborah Yanazzo  
18 Deborah Yanazzo  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

5401008/26997-0030